

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)	
VANESSA GILES,)	CASE NO.: 19-13918-djb
AKA VANESSA WATSON-GILES,)	CHAPTER 13
)	JUDGE DEREK J. BAKER
DEBTOR.)	
)	
MTGLQ INVESTORS, L.P., AS SERVICED BY)	
NEWREZLLC D/B/A SHELLPOINT MORTGAGE)	
SERVING,)	
)	
CREDITOR.)	
)	
VANESSA GILES, DEBTOR, AND)	
KENNETH E. WEST, TRUSTEE,)	
)	
RESPONDENTS.)	

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

MTGLQ Investors, L.P. as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion to Allow Homeowner Assistance Funds Received to be applied to Loan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **May 7, 2025**, you or your attorney must do all of the following:
- (a) file an answer explaining your position at:

United States Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to Movant's attorney:
- Joshua I. Goldman, Esq.
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Derek J. Baker, the United States Bankruptcy Judge, United States Bankruptcy Court, in Courtroom 2, at 900 Market Street, Philadelphia, PA 19107 on **May 22, 2025 at 11:00am.** as soon thereafter as counsel can be heard, to consider the motion.

4. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

5. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

Dated: April 23, 2025

/s/ Joshua I. Goldman

Joshua I. Goldman, Esq.

Pennsylvania Bar # 205047

PADGETT LAW GROUP

6267 Old Water Oak Road, Suite 203

Tallahassee, FL 32312

(850) 422-2520 (telephone)

(850) 422-2567 (facsimile)

josh.goldman@padgettlawgroup.com

Counsel for Movant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the List by electronic notice and/or by First Class U.S. Mail on this the 23rd day of April 2025:

VIA U.S. MAIL

DEBTOR

VANESSA GILES
6248 HAZEL AVE.
PHILADELPHIA, PA 19143

VIA ELECTRONIC NOTICE

ATTORNEYS FOR DEBTOR

ZACHARY PERLICK
1420 WALNUT STREET
SUITE 718
PHILADELPHIA, PA 19102
PERLICK@VERIZON.NET

TRUSTEE

KENNETH E. WEST
OFFICE OF THE CHAPTER 13 STANDING TRUSTEE
190 N. INDEPENDENCE MALL WEST
SUITE 701
PHILADELPHIA, PA 19106
ECFEMAILS@PH13TRUSTEE.COM

U.S. TRUSTEE

UNITED STATES TRUSTEE
OFFICE OF UNITED STATES TRUSTEE
ROBERT N.C. NIX FEDERAL BUILDING
900 MARKET STREET, SUITE 320
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/s/ Joshua I. Goldman

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